

Michael J. Frevola  
Lissa D. Schaupp  
HOLLAND & KNIGHT LLP  
195 Broadway  
New York, NY 10007-3189  
(212) 513-3200

ATTORNEYS FOR PLAINTIFF  
TASFIYE HALINDE AHU TRANS DENIZCILIK  
VE TICARET LIMITED SIRKETI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TASFIYE HALINDE AHU TRANS DENIZCILIK VE  
TICARET LIMITED SIRKETI,

Plaintiff,

-against-

NATEUS VERZEKERINGEN a/k/a NATEUS NV a/k/a  
NATEUS ASSURANCES a/k/a NATEUS SA f/k/a  
BELGAMAR BELGISCHE  
ZEEVERZEKERINGSMAATSCHAPPIJ N.V. a/k/a  
COMPANIE BELGE D'ASSURANCES MARITIMES S.A.,

Defendant.

08 Civ. 2511 (JGK)

**AFFIDAVIT IN SUPPORT  
OF REQUEST FOR  
SECOND AMENDED  
ORDER OF ATTACHMENT**

STATE OF NEW YORK )

) ss:

COUNTY OF NEW YORK )

Michael J. Frevola, being duly sworn, deposes and says:

1. I am a member of the firm of Holland & Knight LLP, attorneys for plaintiff Tasfiye Halinde Ahu Trans Denizcilik ve Ticaret Limited Sirketi ("Plaintiff"), and I am duly

admitted to practice before the United States District Court for the Southern District of New York.

2. I am familiar with the facts and circumstances underlying this dispute and I am submitting this affidavit in support of the Second Amended Verified Complaint and the Second Amended Writ of Attachment.

3. Defendant Nateus Verzekeringen a/k/a Nateus NV a/k/a Nateus Assurances a/k/a Nateus SA f/k/a Belgamar Belgische Zeeverzekeringsmaatschappij N.V. a/k/a Companie Belge D'Assurances Maritimes S.A. ("Defendant") is not listed in the telephone directory of the principal metropolitan areas in this district, nor is it listed in the Transportation Tickler, a recognized commercial directory in the maritime industry.

4. Our office contacted the Secretary of State for the State of New York and was advised that Defendant is neither a New York business entity, nor was it a foreign business entity authorized to do business in New York.

5. To the best of my information and belief, Defendant cannot be found within this district or within the State of New York.

6. Based upon the facts set forth in the Second Amended Verified Complaint, I respectfully submit that the Defendant is liable to Plaintiff for the damages alleged in the Second Amended Verified Complaint, which amounts, as best as can be presently determined, amount to a total of \$1,388,531.96, including estimated interest. Upon information and belief, Defendant has property, goods, chattels or effects within this jurisdiction, to wit: funds or accounts held in the name(s) of Nateus Verzekeringen, Nateus NV, Nateus Assurances, Nateus SA, Belgamar

Belgische Zeeverzekeringsmaatschappij N.V. and/or Companie Belge D'Assurances Maritimes S.A. at one or more of the following financial institutions:

Bank of America, N.A.

Bank of China

The Bank of New York

Citibank, N.A.

Deutsche Bank Trust Company Americas

HSBC Bank USA, N.A.

JPMorgan Chase Bank, N.A.

UBS AG

Wachovia Bank, N.A.

Société Générale

Standard Chartered Bank

BNP Paribas

Calyon Investment Bank

American Express Bank

Commerzbank

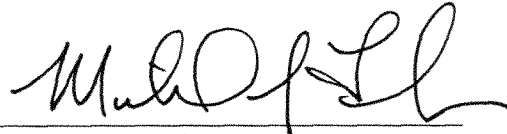
ABN Amro Bank

Bank Leumi USA

Banco Popular

7. Plaintiff is, therefore, requesting that this Court, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, issue an amended writ of maritime attachment for an amount up to \$1,388,531.96.

WHEREFORE, Plaintiff respectfully requests that the application for an amended writ of maritime attachment and garnishment be granted.



Michael J. Frevola

Sworn to before me this  
26<sup>th</sup> day of June, 2008

  
Notary Public

# 5399991\_v1

WALLIS BETH KARPf  
Notary Public, State Of New York  
No. 01KA6047092  
Qualified In New York County  
Commission Expires August 28, 2010